



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
475 ALLENDALE ROAD – SUITE 102
KING OF PRUSSIA, PA 19406-1415

February 15, 2023

Eugene Chuang, President, CEO
Garg Consulting Services, Inc.
2096A Silas Deane Highway,
Rockyhill, CT 06067

SUBJECT: GARG CONSULTING SERVICES, INC. REQUEST FOR ADDITIONAL
INFORMATION, MAIL CONTROL NO. 633943

Dear Mr. Chuang:

This is in reference to your application dated November 16, 2022, requesting to renew NRC License No. 06-28785-01. Some of the items below reference NUREG-1556, Volume 1, Revision 2, which can be found online at: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v1/index.html>. In order to continue our review, we need the following additional information:

1. Your application's Form 313 described your mailing address as 2096 Silas Deane Highway, rather than the address presently on your license: 2096A Silas Deane Highway. Please confirm whether the "A" after 2096 needs to be retained as part of your mailing address.
2. Your application's Form 313 did not include a request for authorization to use portable nuclear gauges at temporary job sites. We understand that this is an essential part of your operations and will retain this authorization on your renewed license. No response is required for this item.
3. Item 9, Facility and Equipment: Your renewal application provided a description about the location where the nuclear gauges are stored but did not provide a facility diagram as requested in NUREG 1556, Vol. 1, Rev. 2, Section 8.9. Please submit a facility diagram for your nuclear gauge storage location.

4. Item 10, Radiation Safety Program: Your application mentions Troxler Labs or InstroTek multiple times in various commitments of yours. As per NUREG 1556, Vol. 1, Rev. 2 you are not required to provide any of your vendor's information. Please be aware that if you provide any vendors information in your commitments, you will be bound by this commitment to use that specific vendor. To avoid any potential violations, please revise and confirm the following commitments:

- a. NUREG-1556, Volume 1, Revision 2, Section 8.10.2 "Radiation Monitoring Instruments":

We will either possess and use, or have access to and use, a radiation survey meter that meets the criteria in the section titled, "Radiation Safety Program— Radiation Monitoring Instruments" in NUREG–1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses," in the event of an incident.

- b. NUREG-1556, Volume 1, Revision 2, Section 8.10.4 "Occupational Dose":

We will provide and require the use of individual monitoring devices (dosimetry). All personnel dosimeters that require processing to determine the radiation dose will be processed and evaluated by a NVLAP-approved processor.

- c. NUREG-1556, Volume 1, Revision 2, Section 8.10.6 "Operation, Emergency, and Security Procedures":

Operating, emergency, and security procedures will be developed, implemented, and maintained and will meet the criteria in section 8.10.6, "Radiation Safety Program— Operating, Emergency, and Security Procedures," NUREG–1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program- Specific Guidance About Portable Gauge Licenses." Copies of these procedures will be provided to all gauge users and will be available at each jobsite.

- d. NUREG-1556, Volume 1, Revision 2, Section 8.10.7 "Leak Tests":

Leak tests will be performed at intervals approved by the NRC or an Agreement State and specified in the SSD registration certificate. Leak tests will be performed by an organization licensed by the NRC or an Agreement State to provide leak testing services to other licensees; or by using a leak test sample collection kit supplied by an organization licensed by the NRC or an Agreement State to provide leak test kits and/or sample analysis services to other licensees and according to the kit supplier's instructions. Records of leak test results will be maintained.

5. Item 10.8 Radiation Safety Program – Maintenance: Your submitted commitment for routine and nonroutine maintenance does not adequately capture the language in NUREG–1556, Vol. 1, Rev. 2, Section 8.10.8. Please update your commitment to the following:
- a. *Routine Cleaning and Lubrication*: We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's written recommendations and instructions.
 - b. *Nonroutine Maintenance*: The gauge manufacturer or other person licensed by the NRC or an Agreement State will perform nonroutine maintenance or repair operations that require detaching the source or source rod from the gauge.

We will continue our review upon receipt of this information. Please reply to my attention at Netra.Patel@nrc.gov, referencing to mail control number 633943.

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

An electronic version of the NRC's regulations is available on the NRC Web Site at: www.nrc.gov. Additional information regarding use of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/mat-toolkits.html>. This site also provides the link to the toolbox for updated information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: <http://www.nrc.gov/reading-rm/adams.html>. Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me at 610-337-5364 or via electronic mail at Netra.Patel@nrc.gov.

Thank you for your cooperation.

Sincerely,

Jason vonEhr, Health Physicist
Commercial, Industrial, R&D
and Academic Branch
Division of Radiological Safety and Security
Region I

License No. 06-28785-01
Docket No. 03032913
Mail Control No. 633943

cc: Zhen Zhou, Radiation Safety Officer

GARG CONSULTING SERVICES, INC. REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 633943 DATED FEBRUARY 15, 2023.

DOCUMENT NAME: G:\WBL Documents\WBL License RAI\L06-28785-01.633943.RAI.docx

SUNSI Review Complete: NPatel

After declaring this document "An Official Agency Record" it will be released to the Public.

To receive a copy of this document, indicate in the box: "C" = Copy w/o attach/encl "E" = Copy w/ attach/encl "N" = No copy

OFFICE	RI:DRSS	N	RI:DRSS	N				
NAME	Netra Patel / NSP		Jason vonEhr					
DATE	2/16/2023		02/16/2023					

OFFICIAL RECORD COPY